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May 9, 2024

Via U.S. Mail

Keenan T. Knight
DOC No. 446532
Green Bay Correctional Institution
PO Box 19033
Green Bay, WI 54307

Re: *Keenan Knight v. Amika Avery, et al.*
E.D. Wis. Case No. 23-cv-886

Dear Mr. Knight:

I am in receipt of your Motion to Compel filed April 17, 2024 (ECF No. 22). Within it, you ask that my clients respond to requests for admission that you previously served. Please note that my clients did respond to those requests on April 15, 2024. However, it appears as though we inadvertently listed your prior address at the Dodge Correctional. I apologize for this oversight. Enclosed with this letter please find a copy of my clients' responses to your requests for admissions.

In your motion to compel you also take issue with certain documents that you have requested. I believe this relates to your requests for documents postmarked March 22, 2024 and received by my office March 28, 2024. A copy of your requests is enclosed for your convenience. Because the discovery deadline was April 18, I deemed your requests untimely. However, in light of Magistrate Judge Nancy Joseph's May 8, 2024 Text Only Order extending the discovery deadline to June 18, I will instruct my clients to respond.

Please note that I have been unavailable, at times, due to illness. I appreciate your willingness to maintain open communication. I will do my best to respond to your document requests well in advance of the June 18, 2024 discovery deadline. In the future, I ask that you please consult with me prior to filing a motion to compel with the Court. Often times, parties can reach an agreement without court intervention.

Sincerely,

Milwaukee County Office of Corporation Counsel

s/ Dale R. Nikolay
DALE R. NIKOLAY
Assistant Corporation Counsel

DRN/smm

Enclosures

cc w/o encls: Magistrate Judge Nancy Joseph (via CM/ECF Filing)
United States Courthouse, Room 249
517 E. Wisconsin Ave.
Milwaukee, WI 53202